

TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*

22 MJ 682

Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff \_\_\_ Defendant \_\_\_ DOJ \_\_\_

Name: \_\_\_\_\_

Firm Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

INDICATE UPON THE PUBLIC DOCKET SHEET: YES \_\_\_ NO \_\_\_

If yes, state description of document to be entered on docket sheet:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**MANDATORY CERTIFICATION OF SERVICE:**

A.) \_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.) \_\_\_ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

DATE

SIGNATURE

**A) If pursuant to a prior Court Order:**

Docket Number of Case in Which Entered: \_\_\_\_\_

Judge/Magistrate Judge: \_\_\_\_\_

Date Entered: \_\_\_\_\_

**B) If a new application,** the statute, regulation, or other legal basis that authorizes filing under seal

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.**

DATED: \_\_\_\_\_, NEW YORK

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_

DATE

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

22 MJ 682

United States of America

v.

Case No.

682

)  
)  
)  
)  
)  
)  
)\_\_\_\_\_  
*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) \_\_\_\_\_,

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☐ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

Date: \_\_\_\_\_


*Issuing officer's signature*

City and state: \_\_\_\_\_

\_\_\_\_\_  
*Printed name and title*

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Arresting officer's signature*\_\_\_\_\_  
*Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only  
and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (*name, relation, address, phone number*): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (*if applicable*): \_\_\_\_\_

DMP/AAS:CRH/JGH/SKW  
F. #2020R00147

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

IBRAHIM ALHUSSAYEN,

Defendant.

----- X

**TO BE FILED UNDER SEAL**

**COMPLAINT AND**  
**AFFIDAVIT IN SUPPORT**  
**OF ARREST WARRANT**

Case No. 22 MJ 682  
(18 U.S.C. §§ 1001(a)(1) and 1001(a)(2))

EASTERN DISTRICT OF NEW YORK, SS:

KRISTINE I. MARAYAG, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

**CONCEALING MATERIAL FACTS AND MAKING FALSE STATEMENTS**

On or about and between June 29, 2021 and January 12, 2022, within the Eastern District of New York and elsewhere, the defendant IBRAHIM ALHUSSAYEN did knowingly and willfully (a) falsify, conceal and cover up by trick, scheme and device one or more material facts; and (b) make one or more materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the Federal Bureau of Investigation ("FBI"), in that ALHUSSAYEN falsely stated and represented to FBI special agents that he does not control or use one or more pseudonymous social media accounts, when in fact ALHUSSAYEN controlled and operated at least one pseudonymous Instagram account bearing the username "@samar16490" which

ALHUSSAYEN used to, inter alia, threaten and harass dissidents and critics of the Kingdom of Saudi Arabia.

(Title 18, United States Code, Sections 1001(a)(1) and 1001(a)(2))

### FACTUAL ALLEGATIONS

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2017. I am assigned to the counterintelligence and cyber division of the FBI's New York Field Office, and I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups whose conduct may constitute a threat to national security and/or constitute a violation of federal law, including, but not limited to, investigations into foreign malign influence. I have conducted and participated in surveillance, witness interviews, the execution of physical and electronic searches, and arrests. I have received mobile technology training as well as attended courses on how to review and/or examine digital evidence. As a result of my training, education and experience, I am familiar with the manner in which criminal activity is carried out, and the efforts of persons involved in such activity to avoid detection by law enforcement.

#### I. Background

2. The FBI has been investigating an online campaign to harass and intimidate several individuals, some of whom are United States residents, including at least one individual who resides in the Eastern District of New York. The online harassment campaign is directed at

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

individuals, typically women, who have been identified as political dissidents of, or otherwise voiced opposition to, the government of the Kingdom of Saudi Arabia (“KSA”), or relatives and family members of those individuals. The online harassment campaign is consistent with efforts by agents of the KSA government to harass and intimidate dissidents and other individuals critical of the KSA government.

3. As discussed further below, IBRAHIM ALHUSSAYEN, who represented himself to be an employee of the KSA government, used his pseudonymous Instagram account “@samar16490” (the “Samar Account”) to harass several individuals he perceived to be political opponents of the KSA government, and did so while residing in the United States. One of the individuals targeted by ALHUSSAYEN resided in the Eastern District of New York. When confronted about his activity by FBI agents, ALHUSSAYEN repeatedly lied and denied any relationship to the Samar Account that he used to harass his victims. ALHUSSAYEN’s false statements were material to an ongoing Federal Grand Jury investigation in the Eastern District of New York, and served to impede and obstruct the investigation into the harassment of political dissidents.

## II. ALHUSSAYEN’s Association with the KSA Government

4. IBRAHIM ALHUSSAYEN is a 42-year old male, and a KSA citizen who has resided in the United States since at least approximately 2013. ALHUSSAYEN entered the United States via an F1 student visa application, and attended two different universities in Mississippi. ALHUSSAYEN currently resides in Brandon, Mississippi.

5. In the F1 visa application, ALHUSSAYEN listed his occupation as “Government” and his employer as “Saudi Royal Court.” Based on my training and experience, I know that the “Saudi Royal Court” is a reference to the KSA monarchy, which directly controls the KSA government.

6. Toll records reveal that a telephone number used by ALHUSSAYEN was in regular contact between January 2019 and August 2020 with a phone number associated with a person who, according to U.S. visa records, is employed by the KSA “General Presidency of Youth Welfare.” According to open-source records, that organization has subsequently been renamed the “General Sports Authority,” which is under the direction of a KSA official who is a minister at the Saudi Royal Court (the “KSA Official”). As discussed below, one of the persons targeted for harassment by ALHUSSAYEN was a critic of the KSA Official.

7. ALHUSSAYEN has a history of extreme rhetoric towards individuals critical of the KSA government. Specifically, ALHUSSAYEN previously admitted, during a voluntary interview with law enforcement on or about October 8, 2014, that he had called another KSA national a “dog of hell” and a “kharajite,” which I understand to be a derogatory Arabic term used to describe someone who has abandoned a leader. ALHUSSAYEN further advised during his October 2014 interview that he made these comments to the KSA national after that person made negative comments about the KSA government and its king.

8. On or about January 12, 2022, border enforcement officials at Dulles International Airport in Virginia conducted a border inspection of a mobile device belonging to IBRAHIM ALHUSSAYEN, who had arrived on a flight originating in the KSA. One of ALHUSSAYEN’s devices contained multiple saved images of Saudi journalist Jamal Khashoggi.

9. In February 2021 the United States Intelligence Community publicly released an assessment that concluded that the KSA government authorized the capture and killing of Jamal Khashoggi as part of a series of “dissident suppression operations” within the KSA and abroad. In October 2018, Khashoggi was assassinated at the Saudi consulate in Istanbul, Turkey, by KSA agents.

10. One of ALHUSSAYEN's devices also contained screen shots of two "tweets" from Khashoggi's Twitter account, which appear to have been saved to ALHUSSAYEN's device on or about November 10, 2017, and December 1, 2017—nearly a year before Khashoggi's death. Notably, in and around November 2017 and December 2017, Khashoggi published several pieces for the Washington Post that were critical of the KSA government. Based on my training and experience, I believe that ALHUSSAYEN's possession of photos of and tweets by Khashoggi reflect ALHUSSAYEN's interest in KSA dissidents.

### III. ALHUSSAYEN's Control of the Samar Account

11. ALHUSSAYEN is the user of the Samar Account. Records from Meta show that the Samar Account was registered using the email address "i\_hussayen@hotmail.com" (the "Hotmail Account"). In turn, the Hotmail Account is registered to "Ibrahim abdulrahman" of Saudi Arabia. Notably, "Ibrahim abdulrahman" are the first and middle names of IBRAHIM ALHUSSAYEN. Additionally, as detailed below, ALHUSSAYEN confirmed to the FBI that the Hotmail Account is his email account.

12. ISP records show that an Internet Protocol ("IP") address used to log in to the Samar Account in April 2020 was assigned to "Ibrahim Alhussayen" at an address in Mississippi, with an email address of "alhussayen80@gmail.com" (the "Gmail Account"). As discussed further below, ALHUSSAYEN resides at that Mississippi address and, during a voluntary interview with the FBI, ALHUSSAYEN confirmed that the Gmail Account is his account.

### IV. ALHUSSAYEN's Use of the Samar Account to Harass Multiple Persons

13. ALHUSSAYEN has used the Samar Account to contact and harass individuals known to be critical of the KSA government.



14. For example, ALHUSSAYEN used the Samar Account to contact an Instagram account (“Account-1”) that is associated with a KSA dissident (“Victim-1”). Victim-1 is a KSA citizen who moved to the United States and who later petitioned for asylum in the United States. In an interview with law enforcement agents, Victim-1 stated that she is an “influencer” on social media, and that while she does not consider her social media posts to be directly critical of KSA, she does post her opinions about various policy issues, including where she disagrees with KSA policy. Victim-1 also told law enforcement agents that she believes she would be killed if she returned to Saudi Arabia, and that her father had made a request to all Victim-1 family members to kill her.

15. On or about February 16, 2020, ALHUSSAYEN’s Samar Account wrote a comment to Account-1, stating “plenty of headache and dirt, I hope you will have the same fate/end up as Nada al-Qahtani.” I know “Nada al-Qahtani” is the name of a Saudi Arabian woman who was shot and killed by her brother in the KSA. Media reporting on the death stated that the murder was possibly an “honor killing,” which I understand to be a killing committed by a male family member of a female family member who is perceived to have brought dishonor to the family.

16. Additionally, on or about March 7, 2020 and March 9, 2020, the Samar Account sent private direct messages to Account-1 stating, according to a draft translation from Arabic, “I am spitting on your face” and “I am spitting on this face.”<sup>2</sup>

17. Similarly, ALHUSSAYEN used the Samar Account to contact another Instagram account (“Account 2”) associated with another KSA dissident (“Victim-2”). According

---

<sup>2</sup> Unless otherwise indicated, all quoted statements are draft verbatim translations of statements that were originally written in Arabic.

to an October 2015 news report, Victim-2 is the spouse of a Saudi blogger who was jailed in 2012 for “insulting Islam.”

18. Between January and August 2020, the Samar Account sent multiple public and private direct messages to Account-2. These include the following:

<u>Message Date</u>	<u>Type of Message</u>	<u>Message</u>
2020-01-24	Public Comment	A dog who got what he deserves, I hope they will jail/put you in prison too
2020-01-28	Public Comment	I am spitting on this face
2020-03-07	Public Comment	he was never released from prison, you whore.
2020-04-05	Public Comment	May God save us from evil and evil deeds
2020-04-19	Direct Message	Fuck you!
2020-05-10	Public Comment	may God curse you and Raif, you whore
2020-08-20	Public Comment	May God curse you, you dirty one

19. Victim-2, who currently resides in Canada, has informed the FBI that she has received many threatening and hateful messages online because some people perceive her husband to be an apostate.

20. Additionally, the January 2022 border search of IBRAHIM ALHUSSAYEN’s devices described above revealed that the same cellular phone that contained images of Jamal Khashoggi also contained a screenshot of a Facebook Messenger message in Arabic apparently sent by ALHUSSAYEN to Victim-2 stating, in sum and substance, “I spit on your face.”

21. As another example, ALHUSSAYEN used the Samar Account to contact an Instagram account (“Account-3”) associated with a Saudi individual who espoused feminist views, renounced Islam, fled Saudi Arabia, and sought asylum in Canada in January 2019 (“Victim-3”). Between approximately June 2020 and January 2021, the Samar Account sent three private direct messages to Account-3, including a number of threatening messages. For example, on or about June 30, 2020, the Samar Account wrote “And how is [your] mother?”. On or about

January 20, 2021, the Samar Account wrote “Oh, whore, are you dealing in stocks nowadays,” and then wrote, “How is your castrated slave?”

22. Additionally, between July and October 2020, the Samar Account sent several threatening messages to an Instagram account (“Account-4”) that was used by a former fiancé and intimate partner of Victim 3 (“Victim 4”). These messages included the following:

<u>Message Date</u>	<u>Type of Message</u>	<u>Message</u>
2020-07-15	Direct Message	Do you think you going to be safe with here [in English]
2020-07-18	Direct Message	Your mother fucker [in English]
2020-08-05	Direct Message	Fuck you [in English]
2020-10-28	Public Comment	may God forgive me
2020-10-28	Public Comment	I am spitting on your face

23. During an interview with FBI agents, Victim-4 stated, in sum and substance, that he/she received daily threats from the Samar Account, which ultimately led Victim-4 to block the Samar Account from his/her Instagram account. After blocking the Samar Account, Victim-4 began receiving more threatening messages from similarly named accounts. Victim-4 believed that he/she was targeted by the user of the Samar Account, as well as by other accounts on social media, because of Victim-4’s relationship to Victim-3, and Victim-3’s status as a KSA dissident. Regarding the messages sent to Account-4 cited above, Victim-4 stated, in sum and substance, that the messages made him/her feel threatened and unsafe.

24. The Samar Account has harassed and threatened other persons affiliated with KSA dissidents. For example, on or about September 19, 2020, the Samar Account engaged in a series of private direct messages with the user of an Instagram account (“Account-5”) who, based on the content of the Samar Account’s direct messages to Account-5, I assess had publicly posted comments defending Victim-3 from online attacks. Among other things, the Samar

Account wrote, “I swear I am going kick your ass” and, when asked by the other person why, the Samar Account responded, “You defend [first name of Victim-3], bitch!”

25. The Samar Account continued to threaten and harass the user of Account-5, sending a stream of private direct messages, including the following:

<u>Message Date</u>	<u>Message Type</u>	<u>Message</u>
2020-09-18	Direct Message	I swear I am going to kick your ass.
2020-09-19	Direct Message	You slut, I am going to teach you a lesson!
2020-09-19	Direct Message	If you have not been raised well by your family, we will discipline you.
2020-09-19	Direct Message	And this [Victim 3], who you are defending, you will be hearing news about her. You will wish that you had died before hearing such news.
2020-09-19	Direct Message	I swear we will wipe you off the face of the earth!
2020-09-19	Direct Message	Soon, I will know where you are and get you, bitch.
2020-09-19	Direct Message	Fine, go ahead and make fun of me. Let me see how smart you are when we get our hands on you.
2020-09-19	Direct Message	You'll see, bitch, who is going to do as he pleases.
2020-09-19	Direct Message	I swear I will not let you be.
2020-09-19	Direct Message	See [what happened to] Amal Al Asmary
2020-09-19	Direct Message	Soon, you will face the same fate.
2020-09-19	Direct Message	along with Lujayn
2020-09-19	Direct Message	Oh, are you accusing the government while you are in Saudi Arabia?
2020-09-19	Direct Message	MBS <sup>3</sup> will wipe you of the face of the earth, you will see.
2020-09-19	Direct Message	I will teach you a lesson.
2020-09-19	Direct Message	You will face the same fate as Amal Al Asmary
2020-09-19	Direct Message	And remember what I said.
2020-09-19	Direct Message	Be careful and do not cross your boundaries.
2020-09-19	Direct Message	This is the last time I see you do this. I do not want to see a comment from you defending [Victim-3] and the likes.

---

<sup>3</sup> “MBS” is a reference to Mohammed bin Salman Al Saud, the Crown Prince of KSA.

2020-09-19	Direct Message	If you do it again, do not blame anyone, but yourself.
2020-09-19	Direct Message	Go make a comment on [Victim 3]'s account.

26. Based on my knowledge, training and experience, as well as open-source records, I assess that the Samar Account's reference to "Amal Al Asmary" is a reference to Dr. Amal Alasmari, a Saudi woman who was seen in public without an abaya<sup>4</sup> and, according to open-source reporting, was believed to have been arrested as a result.

27. The investigation has also revealed that ALHUSSAYEN took efforts to harass an individual originally from the KSA and who currently resides in the Eastern District of New York ("Victim-5"). Victim-5 maintains a social media presence, where she has made statements critical of the KSA government. Among other individuals, Victim-5 has been specifically critical of the KSA Official. As discussed above, ALHUSSAYEN is associated with KSA government sports organization operated by the KSA Official.

28. Beginning on or about December 9, 2019, Victim-5 received a message on Instagram from the Samar Account via private direct message. The Samar Account claimed to have "important information." The Samar Account further claimed that he had been "following you on Twitter for some time, and I know about your problems with the [KSA citizen.]" ALHUSSAYEN further stated that the information he had came from KSA government files, and that "If I meet you, I would let you see them." ALHUSSAYEN further indicated he would "be in New York toward the end of December."

29. Victim-5 declined the offer from the Samar Account. Nonetheless, ALHUSSAYEN continued to contact Victim-5. When Victim-5 expressed a lack of interest in

---

<sup>4</sup> An abaya is a loose-fitting, full-length robe symbolic of Islamic piety. Prior to 2019, KSA required females to wear an abaya in public.

communicating with the Samar Account, ALHUSSAYEN continued to write to Victim-5 and try to communicate with her.

30. Based on my training and experience, I know that individuals engaged in this type of harassment campaign have, in the past, attempted to befriend targets of a harassment campaign so that they can lure them into complacency and later use their trust against them. Accordingly, ALHUSSAYEN's conduct appears to be an attempt to gain information about Victim-5's whereabouts, which could be used to surveil and further harass Victim-5 in person.

V. ALHUSSAYEN's Materially False Statements to Law Enforcement

31. On three occasions between June 2021 and January 2022, ALHUSSAYEN participated in voluntary interviews with federal law enforcement agents in which he lied to the law enforcement agents about ALHUSSAYEN's use of one or more social media accounts. Specifically, ALHUSSAYEN falsely claimed that he did not have or use any social media accounts other than accounts in his own name, when in fact ALHUSSAYEN had and used the Samar Account between at least approximately October 2019 through October 2021. During voluntary interviews with the FBI in both July 2021 and January 2022, law enforcement agents cautioned ALHUSSAYEN at the outset of the interview that making a false statement to law enforcement agents is a criminal offense.

A. The June 29, 2021 Interview

32. On or about June 29, 2021, ALHUSSAYEN participated in a voluntary interview with federal law enforcement officers in Brandon, Mississippi. ALHUSSAYEN was advised, in sum and substance, that the purpose of the interview was to discuss issues with his F1 visa. During this interview, ALHUSSAYEN told law enforcement, in sum and substance and relevant part, that he was enrolled at a university in Mississippi, where he was working on a PhD in public policy. He further stated that his tuition was being paid by his employer, the Saudi Royal

Court, where he worked as an administrative advisor. ALHUSSAYEN further stated, in sum and substance, that he was not working or engaged in other tasks on behalf of the KSA, except for attending school.

33. ALHUSSAYEN stated, in sum and substance, that all utilities, including cable and internet services, were in his name. He further stated that his internet service required a security password to access the network, and that he did not provide his password to visitors or neighbors. As noted above, an IP address that was used to log into the Samar Account was associated with ALHUSSAYEN's residence and internet service.

34. ALHUSSAYEN was asked specifically about social media accounts that he used or controlled. ALHUSSAYEN stated that he had a Facebook account in his true name, an associated Instagram account, also in his true name, as well as a Snapchat account which he used to communicate exclusively with family. He further stated that he had a Twitter account but had deleted it.

35. As noted above, an Instagram account in ALHUSSAYEN's true name was accessed from the same device that accessed the Samar Account.

36. During the same interview, ALHUSSAYEN falsely denied having any other social media account other than the ones in his true name that he identified to law enforcement.

B. The July 28, 2021 Interview

37. On or about July 28, 2021, ALHUSSAYEN participated in another voluntary interview with federal law enforcement agents. During the interview, ALHUSSAYEN was advised, in sum and substance, that an IP address associated with ALHUSSAYEN was used to access a website that contained extremist propaganda associated with Islamic terrorism. Law

enforcement agents further advised ALHUSSAYEN, in sum and substance and relevant part, that it was important for him to tell the truth and that lying to a federal agent could be charged as a crime.

38. During this interview, ALHUSSAYEN again stated, in sum and substance and relevant part, that he was obtaining his PhD at a university in Mississippi. He further stated that fifty percent of his income while in the United States was covered by a scholarship provided by his employer, the Saudi Royal Court, and the remaining fifty percent was provided by the Saudi Cultural Mission. ALHUSSAYEN said he worked as an administrative advisor and consultant for the Saudi Royal Court until 2012. ALHUSSAYEN stated that he was not doing work on behalf of the KSA government at this time, except for attending school.

39. With regard to social media accounts, ALHUSSAYEN stated, in sum and substance, that he had accounts with Snapchat, Facebook, Instagram, Twitter and YouTube. ALHUSSAYEN further stated that he was the sole user of his social media accounts, and that he did not grant anyone else access to use his social media accounts. ALHUSSAYEN also falsely stated that all of his accounts were in his true name.

40. With regard to email accounts, ALHUSSAYEN identified his current email account as alhussayen80@gmail.com (identified as the Gmail Account above) and his former email account as i\_hussayen@hotmail.com (identified as the Hotmail Account above). ALHUSSAYEN confirmed he did not have any other email accounts and he was the only one who had access to his email accounts.

C. The January 12, 2022 Interview

41. On or about January 12, 2022, ALHUSSAYEN participated in a voluntary interview with FBI agents from the FBI's New York Field Office. During that interview, the



agents informed ALYHUSSAYEN that they were conducting an investigation in coordination with the U.S. Attorney's Office for the Eastern District of New York.

42. ALHUSSAYEN was also advised, in sum and substance, that he could be charged with a crime for lying to federal law enforcement.

43. During the interview, ALHUSSAYEN confirmed that he resides with his family in Brandon, Mississippi, and that all of the utilities at his residence are held in his name. ALHUSSAYEN further stated, in sum and substance, that he uses a password-protected wireless network to access his social media accounts at home, and that no one aside from his wife has access to the wireless network. When asked what social media accounts he has, ALHUSSAYEN stated that he has a Facebook, Instagram and LinkedIn account in his own name, as well as a Snapchat account with the login/username "ibr80." ALHUSSAYEN also stated that he has three email accounts: the Gmail Account, the Hotmail Account; and a university email account. ALHUSSAYEN stated that no one else has access to his social media accounts. When asked, ALHUSSAYEN falsely stated that he does not have any social media accounts other than the accounts in his true name which he had previously identified to the agents.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant IBRAHIM ALHUSSAYEN and that he be dealt with according to law. I further request that this affidavit and the arrest warrant be filed under seal as disclosure of this application would give the defendant and any coconspirators an opportunity to destroy or tamper with evidence, harm or threaten victims or other witnesses, change patterns of behavior, notify confederates, and flee from or evade prosecution.

- 5 - (RML)

KRISTINE I. MARAYAG

Special Agent, Federal Bureau of Investigation

*+ telephonically*  
Sworn to before me this  
25 day of June, 2022

*Robert Levy*

THE HONORABLE ROBERT M. LEVY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK